

UNITED STATES DISTRICT COURT

JAN 28 2020

for the

Southern District of Texas

David J. Bradley, Clerk of Court

United States of America
v.
Axel Noel Rodriguez Rivera

Case No. C-20-326M

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of January 27, 2020 in the county of Nueces in the
Southern District of Texas, the defendant(s) violated:

Code Section

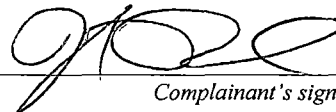
21 U.S.C 841 (a) (1) (b)

Offense Description

Knowingly, intentionally, and unlawfully possess with the intent to distribute more than 500 grams of cocaine, in Schedule II of the Controlled Substance Act of 1970, to wit; 2.59 kilograms of cocaine, approximate gross weight.

This criminal complaint is based on these facts:

See Attachment "A"

☒ Continued on the attached sheet.


Complainant's signature

Quenteric Reed Sr., U.S. Postal Inspector

Printed name and title

Sworn to before me and signed in my presence.

Date: January 28, 2020City and state: Corpus Christi, TX


Judge's signature

Julie K. Hampton, U.S. Magistrate Judge

Printed name and title

ATTACHMENT "A"

On January 24, 2020, as part of ongoing narcotic interdiction efforts, U.S. Postal Inspectors in McAllen, TX domicile, identified the aforementioned parcel and referred the parcel to US Postal Inspector Quenteric Reed, domiciled in Corpus Christi, TX for further inspection. A records check of a law enforcement database for the name of the recipient, Hi-Tech Solutions, revealed that it is an Information Technology Consulting Firm in Chicago, IL and currently does not have any representatives in Corpus Christi, TX.

On January 27, 2020, the aforementioned subject parcel was exposed to a narcotic detection canine name "Byrd" at the U.S Postal Inspection Service, Corpus Christi Domicile, Corpus Christi, TX. Trooper L. Gonzalez, Canine Officer, with the Texas DPS, handles "Byrd". "Byrd" is certified by the standards of the National Narcotic Detector Dog Association (NNDDA). "Byrd" conducted an exterior examination of the above described parcel and alerted to the presence of narcotics in the aforementioned parcel.

On January 27, 2020 search warrant C-20-297M was executed on the parcel and the contents were confirmed and tested positive for cocaine. After the cocaine was field tested, it was re-packaged and placed back into the original box and sealed in preparation for a controlled delivery. The parcel was then taken to a UPS store located in Corpus Christi, TX. The parcel was addressed to box #212 at that location.

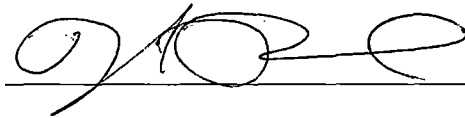
On January 27, 2020 at approximately 5:20 PM, Hispanic male, later identified as Axel Noel Rodriguez Rivera entered the UPS store and stated he was there to pick up the package. A controlled delivery was conducted and Rivera was given the parcel and he

then exited the business. Once outside, Rivera was taken into custody as he was putting the controlled parcel along with another box in the rear of his vehicle.

On January 27, 2020, Inspector Quenteric and Inspector Fernando Cepeda issued Rivera his Miranda Rights. Rivera invoked his right to stay silent.

Assistant United States Attorney Patti Booth accepted the federal prosecution of Rivera.

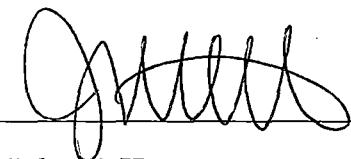
The amount of cocaine, 2.59 kilograms, approximate gross weight, has a wholesale value of approximately \$60,000, and implies the intent to distribute.

A handwritten signature in black ink, appearing to read "Quenteric Reed, Sr.", written over a horizontal line.

Quenteric Reed, Sr., Inspector

United States Postal Inspection Service

Sworn to and subscribed before me on this 28th day of January 2020

A handwritten signature in black ink, appearing to read "Julie K. Hampton", written over a horizontal line.

Julie K. Hampton

United States Magistrate Judge